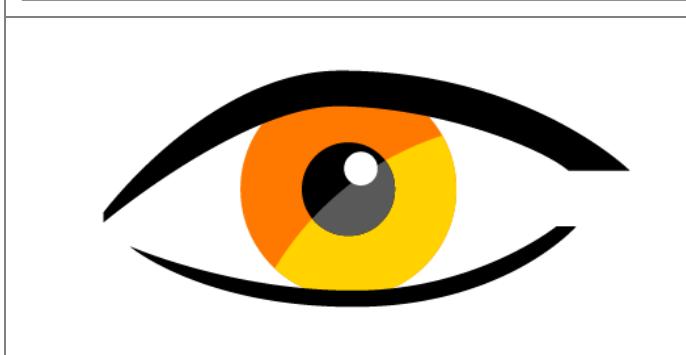
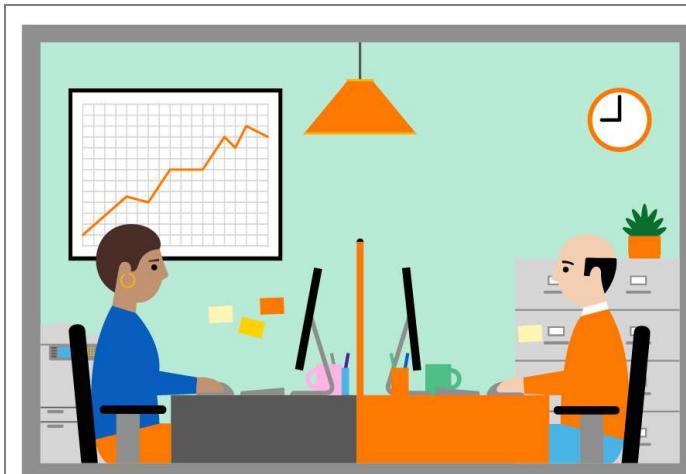


Vigilance Plan

Orange



2021



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2021 VIGILANCE PLAN

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Vigilance Plan 2021

This plan was developed based on the five obligations set out by Law no. 2017-399 of March 27, 2017 on the duty of vigilance of parent companies and contracting companies, (hereinafter the "Law on the duty of vigilance" or the "Law"). It follows the first three plans which Orange published respectively in 2018, 2019 and 2020.

This plan forms part of Orange's new strategic plan, Engage 2025, and the purpose that it outlined in December 2019. This new strategy is based on the idea that economic performance is achieved by leading by example on social and environmental issues. It aims to prepare the route to a sustainable and responsible transformation, in order to monitor the social and human cohesion of the Orange Group's projects (hereinafter the "Group") worldwide. The Group's commitment is reflected in a selection of Sustainable Development Goals (SDG) established by the member states of the United Nations, for which the Orange Executive Committee believes that the Group has, or should have, the capacity to make a genuinely positive contribution. The Group's impacts stemming from Orange's environmental commitments are analyzed and measured through SDG 12 (responsible production and consumption) and SDG 13 (climate action), and those for digital inclusion through SDG 9 (industry, innovation and infrastructure) and 10 (reduced inequalities). These two areas of commitment are backed up by SDG 16 (peace, justice and strong institutions) and SDG 17 (partnerships for the goals).

Commitment to digital inclusion:

- SDG 9: investment in infrastructure and research is essential to achieving sustainable development and community empowerment in many countries. Orange's core business is to offer its customers connectivity with ever faster speed and innovative new related services; Orange is committed to taking action to maximize regional coverage;
- SDG 10: inclusion to reduce inequalities. In addition to its ambitions for regional digital coverage, Orange aims to work for inclusion by training the digitally excluded, supporting its customers, promoting responsible service offers adapted to as many people as possible, and supporting digital entrepreneurship. Orange is also committed to using digital technology to promote development and equal opportunities for its employees and customers;

Commitment to the environment:

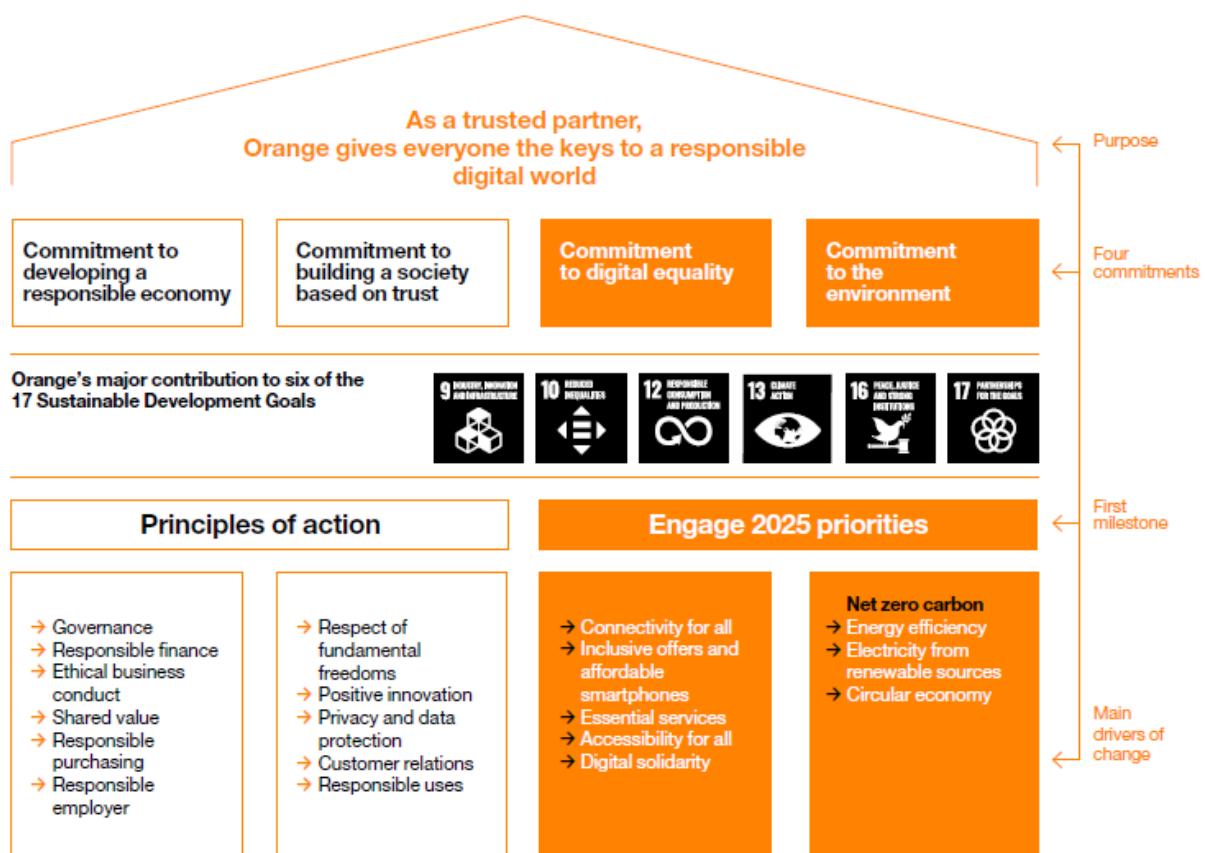
- SDGs 12 and 13: combating climate change and its impacts. For Orange, leading by example on the environment takes the form of a target of being Net Zero carbon by 2040, despite a continuous and steady increase in use across its networks. This will require unprecedented effort in terms of energy efficiency for its own emissions and those of its customers, the implementation of circular economy principles and the increased use of renewable energies. To sequester its residual greenhouse gas emissions, the Group will supplement these measures by investing in carbon sinks.

Support for commitments:

- SDGs 16 and 17: the implementation of Orange's commitments is based on a number of principles of action, namely data protection, including the protection of personal data, transparency and openness, while promoting ethical behavior towards all stakeholders. Orange has also established a Group-wide anti-corruption system. The success of these various initiatives depends on close cooperation with the other players in its ecosystem.

Orange has also created the following purpose: "As a trusted partner, Orange gives everyone the keys to a responsible digital world. Our mission is to ensure that digital services are well thought-out, made available and used in a more caring, inclusive and sustainable way in all areas of our business. Orange does everything in its power to ensure people and organizations enjoy a more autonomous, secure digital life. Through the engagement and expertise of the Group's teams, Orange employs innovative technologies and services everywhere, and for everyone." This purpose was developed following months of consultations with internal and external stakeholders. This purpose was approved by the Shareholders' Meeting on May 19, 2020 and is included in Orange's Bylaws.

The interweaving of this purpose, the Engage 2025 strategy and the selection of the SDGs is reflected in the following diagram:



In addition, in 2019 stronger governance was put in place for the Vigilance Plan. This new governance makes it possible to better define the different levels of the company that contribute to the development, validation and effective implementation of the Vigilance Plan:

- The Governance and Corporate Social and Environmental Responsibility Committee (CGRSE) is a specialized Committee of the Board of Directors for Corporate Social Responsibility (CSR). It examines social and environmental information and documents produced by the Company, including the Vigilance Plan. It examines the Vigilance Plan before it is sent to the Orange Board of Directors for approval;
- The Ethics Committee, which is one of the ExecComm's (Executive Committee) internal governance committees, comprised primarily of senior executives, saw its responsibilities extended to monitoring the Group's non-financial performance in July 2019. These new responsibilities include preparing the Group's Vigilance Plan, the operational monitoring of its implementation and associated reporting. The Ethics Committee confirmed that the Group's CSR Department is responsible for the operational monitoring of the plan's implementation;
- Risk mapping for the Vigilance Plan, together with the Vigilance Plan, are also sent to the Audit Committee (another specialized Committee of the Board of Directors);
- Since December 2019, the Group's CSR Department has been linked to annual Internal Control Reviews (ICR) of Orange divisions. The purpose of the ICRs is to report to the Senior Executive Vice-President on the main risks and hedging instruments in place for each division;
- The role of a cross-functional steering group for the implementation of the plan (CSR Department, Audit, Internal Control and Risk Management Department and Legal Department), is to define new operational directions and better associate the subsidiaries and entities of the Group with actions linked to the implementation of the Vigilance Plan;
- The appointment in 2020 of a manager in charge of rolling out the Group Vigilance Plan, whose missions are to provide support for the processes and operational implementations of the Vigilance Plan in the Group's subsidiaries and entities, and to lead the network of managers in charge of implementing the duty of vigilance, organizing the filing of Duty of vigilance reports and producing the annual report on the implementation of the Plan, and facilitating the exchange of best practices throughout the Group, as well as to contribute to communication and training on the duty of vigilance;
- Each entity in scope for the Vigilance Plan must set out a related action plan which adapts the Group's risk mapping processes and the relevant risk mitigation and prevention measures to its own context. This action plan must be approved by the Board of Directors of the relevant subsidiaries, or by the Management Committee for Orange SA divisions;
- Each entity or subsidiary concerned by the plan must nominate a manager responsible for its implementation.

This governance is reflected in the following diagram:

Vigilance Plan governance



1/11

Orange has also continued to adopt other governance measures to boost compliance with human rights and fundamental freedoms, health and safety and the environment. Therefore, in November 2017 the Group published a human rights report based on the United Nations Guiding Principles on businesses, human rights and stakeholder expectations in this area.

Orange is a signatory of the United Nations Global Compact in compliance with the fundamental principles stated in the Universal Declaration of Human Rights and by the International Labor Organization, and publicly defends its values, in particular as concerns its responsibility towards its supply chain.

Similarly, in a number of the Group's countries, discussions are held with stakeholders on the areas covered by the Law on the duty of vigilance (including diversity, digital inclusion and the circular economy) and in line with the 2025 strategy and the Orange Purpose. This dialog is based on structured processes and stakeholder mapping requiring a balance between external stakeholders (businesses, authorities and civil society) and internal Orange stakeholders, in order to:

- ensure the consistency of the Group's CSR projects and producing a materiality analysis;
- identify and characterize the risks related to the social and environmental challenges of the countries where Orange operates, focusing in particular on detecting "weak signals";
- identify opportunities for innovation opening up new prospects of growth for Orange, while supporting the social and economic development of the countries concerned.

Finally, the next vigilance plan will consolidate the methodological structure of the plan by incorporating a risk-based approach (see part 1/Materiality analysis of CSR issues).

1. Risk mapping: Identifying and assessing risks generated by Orange's operating activities

The Group's risk management method (see methodology described in the 2020 Universal Registration Document (URD), Chapter 2 "Risk factors and activity management framework") is incorporated into the processes used to complete and update risk mapping for the duty of vigilance. It covers the areas set out by the Law, i.e. human rights and fundamental freedoms, health and safety and the environment.

Four clusters (risk groups) have therefore been established. These clusters, which are incorporated into the Company's overall risk map, are as follows:

Cluster one covers risks related to an insufficient or faulty implementation of the plan:

- Failure to identify risks;
- Inefficient preventive measures;
- Failures in the definition of preventive measures;
- Failures in the implementation of preventive measures;
- Failure to provide evidence to authorities on time;

Cluster two relates to potential breaches of human rights and fundamental freedoms:

- Slavery and human trafficking;
- Unacceptable working conditions (supplier and subcontractor sites);
- Breach of a child's rights to a good education and healthy development;
- Infringement of the freedom of association and right to collective bargaining on working conditions;
- Discrimination;
- Breach of the freedom of expression (in civil society);
- violation of privacy;

Cluster three identifies risks to personal health and safety:

- Physical or mental disability of employees (death, occupational accident, occupational illness, disability, etc.);
- Non-compliance with safety instructions for employees and subcontractors working on the network in high-risk areas (construction sites at height, working on antennas, etc.);
- Deterioration of working conditions jeopardizing human health, safety and security;

The fourth and final cluster is related to the environment:

- Non-compliant processing of toxic and hazardous waste (poles in France and Poland, batteries, WEEE, etc.);
- Ineffective collection of used equipment and devices (EEE);
- Failure to fulfill the commitments made by Orange in terms of the environment and use of the circular economy;
- Risk of infrastructure deterioration due to climate change

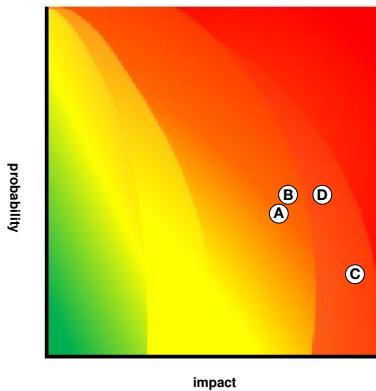
For each of these clusters we define the various risks, their consequences (impact) and causes (probability) should they arise, and the main hedging mechanisms and action plans. In consideration of these analyses, each of these clusters is then assessed according to the following scale: Low, moderate, high, very high.

Since 2018, non-financial risks have been included in the URD in accordance with the new obligations set out by Directive no. 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups. Some of these risks are linked to the areas covered by the Vigilance Plan and can be found in Chapter 2 "Risk factors and business control framework" of the Universal Registration Document.

2021 Risk mapping in relation to the topics of the Law on the duty of vigilance

Risks matrix (alphabetical order)

- (A) Lack of or faulty vigilance plan
- (B) Environmental damage
- (C) Abuses of human rights and fundamental freedoms
- (D) Health, safety and security of people



1

Every year, the Group reviews and approves risk mapping for the duty of vigilance, based on the governance structure set out by the preamble. The positioning of risks has not changed in the 2021 Plan, compared to that defined for the 2020 Vigilance Plan, despite the health crisis of the Covid-19 epidemic, which could have been expected to change this positioning, in particular for health and safety risks. The measures implemented, both preventive and curative, and described in the report on the implementation of the 2020 Vigilance Plan, have mitigated and limited the impact of the epidemic on Health and Safety risks.

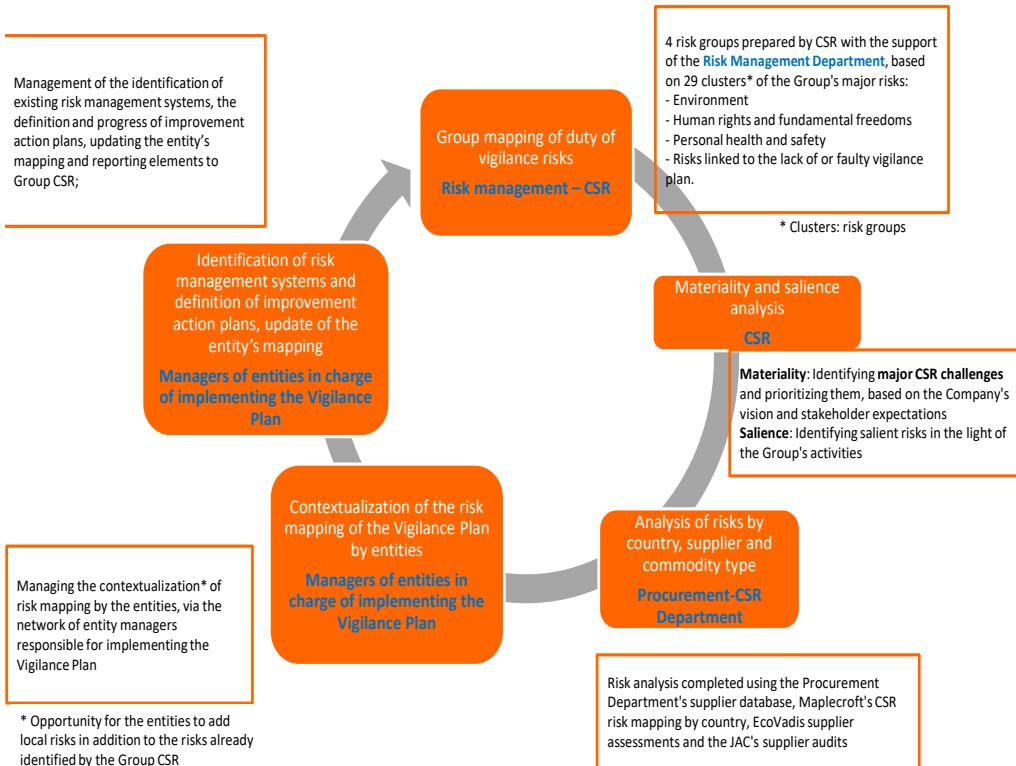
In addition, this mapping developed by the Group is applied at the level of each Orange subsidiary and division, which adapt it to their context and add new risks, if necessary.

For the implementation of this plan, an awareness-raising campaign must be conducted with Orange subsidiaries and divisions to improve the analysis of human rights risks, which sometimes seems underestimated.

When preparing future vigilance plans, the risk management method must be adjusted, to ensure that the methodology will fully take account of risks to stakeholders based on the mapping, as recommended by the Law on the duty of vigilance and by international human rights guidelines. Awareness-raising actions must also be carried out so that Orange's subsidiaries and divisions include third-party risk in their risk analysis.

The diagram below should enable the mapping to evolve in this direction and begin to be measurable during the report on the implementation of this plan 2020.

1. Risk mapping preparation process for vigilance plan risks: identification, analysis and ranking (2021)



Salience analysis based on the Severity scale, Compensation or remediation

In addition, to complete the approach described in the diagram above, Orange has adopted a method based on salience analysis. To that end, Orange's policies are derived from the definition and criteria chosen in the Reporting Framework based on the United Nations Guiding Principles (UNGPs) launched in February 2015 on salient issues (related to human rights)¹. This methodology is based on:

- an assessment of the severity of risks in terms of their effects on people, independently of any policies or action plans implemented by Orange to mitigate their consequences;
- the probability of their occurrence given the Group's scope, independently of any policies or action plans implemented by Orange to mitigate their occurrence;
- on Orange's ability to propose a remedy, i.e. for the effects resulting from any policies or action plans developed by Orange.

Based on these criteria, Orange took part in a GSMA working group to identify salient topics specific to mobile telephone operators. The following topics emerged:

- Respect for private life and freedom of expression;
- Children's rights and their safety online;
- Child labor;
- Forced labor, modern slavery and human trafficking;
- Conflict minerals;
- The impact on communities from construction and maintaining of our infrastructure.

All of these salience issues are taken into consideration in the elaboration of the vigilance plan.

Materiality analysis of CSR issues

In 2021, Orange will renew the materiality analysis of CSR issues for itself and its stakeholders in order to prioritize economic, financial, societal and environmental challenges, thanks to the dialogues that the Group conducted with its stakeholders between 2018 and 2020. The stakeholder dialogues thus feed the Group's materiality matrix, which is currently being consolidated.

¹ <https://www.ungpreporting.org/resources/salient-human-rights-issues/>

In addition, the risks identified by the entities as part of the deployment of the Vigilance Plan will enrich the updating of the materiality exercise and vice versa: this cross-view of the dialogues with the stakeholders on the themes of the law on the duty of vigilance will feed the risk analysis approach of the Vigilance Plan by allowing their prioritisation as seen by the stakeholders. This enrichment will make it possible to qualify the image risk for Orange more precisely and to prioritise the action plans to be implemented to ensure consistency with the priorities of the stakeholders on the related themes.

2. Procedures for the regular assessment of the circumstances of subsidiaries, subcontractors or suppliers with which Orange has a commercial relationship

Orange works collaboratively, willingly and constructively with its subsidiaries, suppliers and subcontractors.

2.1 Subsidiaries

Orange uses an assessment method for its subsidiaries which incorporates the obligations of the Law on the duty of vigilance.

CSR self-assessment questionnaire

This method has been put in place by the Group Audit Control and Risk Management Department (DACRG), and is based on a self-assessment of the subsidiaries and entities by way of a [questionnaire on CSR governance](#). The questionnaire is updated and sent to a selection of entities every year, based on a risk analysis, which includes Orange SA divisions and the Group's main subsidiaries.

The answers and evidence provided by entities is jointly analyzed by the DACRG and the Group CSR Department. A summary is then produced, and action plans and analyses are issued at entity or Group level.

The internal audit may be based on self-assessments or on analyses as part of the annual audit program.

Internal audit work on the implementation of the Vigilance Plan

In early 2019, the Group CSR Department enlisted the Group Audit Department to ensure, within the scope of implementation of the Vigilance Plan (1) that the Vigilance Plan had been properly adapted within the divisions, (2) that the necessary information had been properly consolidated, (3) that the plan had been properly implemented in relations with suppliers, subcontractors and subsidiaries, in order to validate best practice and identify areas of difficulty and thus facilitate adaptation across the Group as a whole. This work helps to improve the implementation of the program through recommendations, without calling the method of implementation into question.

External audit work on the quality of the CSR report and the reliability/comprehensiveness of the data used to calculate the indicators

In addition to the Orange Internal Audit work, KPMG conducts external audits every year to provide a level of "assurance" for the quality and reliability of the CSR indicators and control points, including the duty of vigilance.

Role of the Group Vigilance Plan implementation manager External audit work on the quality of the CSR report and the reliability/comprehensiveness of the data used to calculate the indicators

This manager, whose role is to provide support for the processes and operational adaptation of the Vigilance Plan, ensures a certain consistency in the development of the action plans of the subsidiaries and divisions of Orange and helps them implement the Vigilance Plan within their structure.

ISO 14001 audit

In order to achieve its targets for reducing environmental impacts and risks the Group has been progressively rolling out ISO 14001 compliant Environmental Management Systems (EMS) in its main countries of operation. The ISO 14001 standard describes how companies should organize themselves to manage the environmental impact of their activities. The 2015 version of this standard includes new requirements, which the Group is gradually incorporating, particularly through stakeholder dialogue and by taking into account complete life cycle impacts. The Group's main entities or subsidiaries are ISO 14001-certified.

2.2 Suppliers, subcontractors and partners

Orange's responsible purchasing principles

Orange has for several years implemented a responsible purchasing policy which embeds CSR in its supplier relationships and improves control of social, societal and environmental risks.

This policy is implemented by the Global Procurement & Supply chain, which is part of the Orange Group Finance & Performance Department and which ensures consistency among all the companies of the Group, each of which has its own Procurement Department. Its Group-wide CSR action plan aims to promote the adoption of CSR commitments by purchasing stakeholders and their application in the related business processes, and to guarantee the Group's compliance with the Law on the duty of vigilance. A key event for dialogue with suppliers is organized annually during the "Supplier Forum".

All of these principles have also been adopted by BuyIn, the joint venture between Orange and Deutsche Telekom, which covers the Group's main purchasing domains.

This policy was updated in 2018 (available on the orange.com/Group/Non-financial Reporting) and is designed around the following themes:

- developing balanced relationships with suppliers based on trust, respect and sustainable commercial relationships;
- contributing to economic performance by creating value and ensuring the availability of products and services at the best cost, while preserving competition among strategic suppliers by establishing an industrial policy that protects the interests of the stakeholders;
- controlling CSR risks and opportunities related to procurement and the supply chain, by requiring suppliers to adhere to a code of conduct and respect for laws and regulations;
- providing the Group and its customers with the benefit of the know-how of innovative and high-performance suppliers.

It is based on the systematic incorporation of a CSR clause in the Group's framework agreements as well as into exclusively local contracts, reinforced by the integration of the Code of Conduct into the appendices to these contracts. The Code of Conduct describes in particular the ethical, social and environmental commitments expected by the Group. Orange thus requires that its partners, suppliers and their sub-contractors i) respect all national, European and international rules with respect to ethical and responsible behavior. This includes, without limitation, standards relating to human rights, respect for the environment, sustainable development, occupational health and safety conditions for the employees, corruption and child protection; ii) adopt and apply ethical standards and the Group's commitments and to continue to grow in these domains. Orange supports its suppliers throughout the pre-contractual and contractual relationship to ensure the effective implementation of the Code of Conduct.

Orange's CSR program was developed in cooperation the CSR and Procurement teams. It covers all the subsidiaries and is based on five pillars:

- clear CSR commitments defined in Orange's "Responsible Purchasing Commitments". They are also stated in the CSR Clause of the Supplier Code of Conduct and apply to all suppliers (Group and local);
- a strong CSR culture thanks to CSR training sessions for purchasers;
- effective CSR risk management based on CSR evaluations and supplier audits;
- the active search for opportunities through dialog with subsidiaries and suppliers;
- transparent reporting on the CSR maturity of all the subsidiaries.

Relations with partners

Orange has an extensive partnership policy in order to develop different modes of cooperation, particularly for open innovation (notably via Orange Ventures, whose purpose is to create value by supporting entrepreneurship and start-ups). Partnerships may involve funding borne entirely by Orange, either with public entities (business development, external research, hosting PhD students, etc.) or private entities for development services. They may also be based on joint funding or public subsidies, such as in the context of participation in European projects. All partnerships entered into by the Group are subject to an analysis of the contributions of each partner, an allocation of ownership by income and the definition of the operating regime for the results. They give rise to contracts in accordance with the Group's guidelines. Orange applies the business ethics principles defined by the Group for its partnerships. In sector partnerships that leverage other stakeholders, the partnerships are also made under the cover of an antitrust declaration.

Awareness-raising actions will be carried out so that Orange's subsidiaries and divisions also include partners in the control and analysis processes.

Supplier assessment

Suppliers are assessed at several levels of the contractual relationship, using several tools.

First of all, they are assessed on a documentary basis thanks to the use of a recognized expert, which offers a self-assessment tool based on ISO 26000 for supplier commitment in terms of CSR. The results of the assessment are used to prioritize the actions towards the most vulnerable suppliers from a CSR standpoint.

Then, suppliers are assessed through on-site audits by an expert partner company either within the framework of the JAC, or on behalf of Orange in collaboration with its subsidiaries. Orange deploys a coordinated program of on-site CSR audits founded on verification, assessment, and the development of a common methodology. Audits to assess suppliers' compliance with social and environmental accountability standards (SA 8000, ISO 14001) and, if necessary, to implement corrective action plans.

The Group has set up a monitoring and alert system for purchasing and procurement risks related to suppliers deemed strategic to the organization and whose default could have major consequences on the Group's operations.

In response to the requirements of the Orange Vigilance Plan, the supplier assessment program was revamped and implemented in 2019 in the Group's main subsidiaries (see implementation report) and will be expanded in 2021.

Audits

Orange carries out verifications through on-site and telephone audits.

Audits performed by the JAC (Joint Alliance for CSR)

The **JAC**, founded in January 2010, covers 15 telecommunications operators worldwide. The purpose of this operator collective is to verify, assess and develop the implementation of CSR principles across the manufacturing centers in which the largest ICT suppliers are located, in all countries worldwide and particularly in the Asia region.

The JAC's member operators pool their resources in order to promote CSR principles to suppliers in the sector, based on a shared reference framework which includes Guidelines and a shared audit methodology. The purpose of the JAC Guidelines is to make it easier for suppliers to meet the shared CSR expectations, and to provide support for their implementation throughout the audit and monitoring process. The JAC's questionnaires include 146 items, divided into four areas (social (49), health and safety (49), ethics (29) and environment (19)).

Suppliers have been working together since 2010 to conduct on-site audits of their tier 1, 2 and 3 suppliers.

To boost the impact of its audits, in 2017 the JAC launched a pilot telephone audit with the support of an NGO. This untested method was used alongside traditional audit methods to anonymously and transparently gather employee testimonies under various categories (including wages, discrimination, child labor, etc.).

JAC also works with other institutions (ITU, BSR, CDP, RMI and GSMA) to supplement its requirements on other CSR priorities such as climate change, the circular economy, the traceability of minerals from supply sources that respect human rights and the environment. The JAC welcomes other telecommunication operators so that it can expand its geographical coverage (in Asia, South America and Africa), thus indicating the global nature of its commitment.

Respect for human rights in conflict zones

Orange recognizes the legitimacy of concerns about sourcing materials from regions plagued by political and social conflict, and is committed to using a socially responsible supply chain. However, the supply chain for these minerals is long and complex, involving many players. Orange does not purchase minerals directly, and ensures that its suppliers have performed due diligence to avoid using minerals that may directly or indirectly finance armed groups. As such, Orange requires its suppliers by contract to ensure that they themselves do not use minerals from these areas. This obligation is explicitly included in its Code of Conduct, which is appended to all purchasing contracts, and in the CSR Clause included in such contracts with the suppliers' signature to "Orange's Responsible Purchasing Commitments".

Orange also ensures that this contract clause is correctly followed by its suppliers. Supplier evaluations by EcoVadis take into account the issue of non-use of conflict minerals. The same applies to the audits carried out by the JAC, especially those carried out on site, which have a checkpoint on the procedure to ensure the traceability of minerals. Non-compliance on that point results in corrective actions and their follow-up.

Supplier Relations/Responsible Procurement label and self-assessment based on the international standard

Orange France's Procurement Department has been awarded this label since 2011. In 2017, the label evolved to encompass new ISO 20400 recommendations (the first international standard on responsible procurement). The French Procurement Department was awarded this (now more stringent) label again in January 2019 and January 2020.

Orange wanted to extend the certification process undertaken by the French Procurement Department by ensuring that the Group's Procurement Departments worldwide also adopt these new international recommendations.

Therefore, the Orange Group's Corporate Social Responsibility Department has devised a methodology which enables the Group's (Corporate and Country-based) Procurement Departments to self-assess their performance against the ISO 20400 recommendations. The methodology measures to what extent the ISO 20400 recommendations have been adopted, and their implementation scope, based on 5 topics and 30 essential guidelines.

3. Targeted actions taken to mitigate risks and prevent serious breaches

3.1 Subsidiaries

Training

Backed by its membership of EDH (*Entreprises pour les droits de l'homme*) association, an organization grouping together 16 of the largest French companies, Orange has been deploying an e-learning training called "human rights in companies" since 2016, available in 90% of the countries in which the Group operates, to disseminate its main principles among its employees. E-learning, which is available on the intranet in both English and French, enables employees to identify human rights-related issues in their day-to-day activities as well as the most high-risk areas and activities, and to develop good instincts.

An e-learning module "raising awareness of ethics" has also been developed. In addition, in December 2018 Orange launched the e-learning module "raising awareness of corruption prevention", based on the United Nation's corruption recommendations, which was circulated to all Group functions including CSR. Training and awareness-raising tools for corruption prevention (e-learning and teaching materials for face-to-face training sessions) are made available to Compliance Officers and Ethics Advisors so that they can organize training and awareness-raising programs reflecting the needs of the entities and the risks identified as closely as possible.

Since 2020, Orange has rolled out a CSR visa for all Group employees. The visa raises awareness of CSR principles and the themes of the Engage 2025 Strategy, specifically digital inclusion and the environment. These themes tie in with human rights, environmental and sustainable development risks.

Outside of health crisis periods, more specific face-to-face training is provided for employees directly affected by these issues (i.e. those working in CSR, ethics, compliance, procurement and the logistics chain). Since 2018, representatives from the Group's CSR Department have visited various subsidiaries in the Europe and MEA regions to raise awareness on issues related to the Vigilance Plan.

Furthermore, an awareness program (focusing on the ethics e-learning module) on Code of Ethics action and individual behavior principles is helping to foster a corporate culture that respects rights.

In 2021, the creation of new training modules on Orange learning is planned, to expand upon technical aspects relating to the expectations of Orange subsidiaries and divisions on the deployment of the Vigilance Plan at local level as well as a module on modern slavery and human trafficking.

CSR and Environment seminars/Network of CSR and Environment contacts in all countries in which Orange operates

Each year, the Group holds a CSR seminar and an Environment seminar, attended by CSR and environment contacts from the Group's subsidiaries and entities. Seminar topics include best practices as well as the various business challenges and issues faced by the Group. The duty of vigilance is systematically addressed in these. The CSR and environment contacts then circulate this information to their own subsidiaries. In addition, a regular overarching event is held for managers responsible for implementing the Vigilance Plan and for the Group's CSR Department.

With a view to improving the Plan and its risk prevention and mitigation measures, Orange intends to put forward a minimum common basis for action plans in order to mitigate the risks identified in the Vigilance Plan, and to ensure that the Plan is properly deployed for in-scope entities.

3.2 Major mitigation and specific prevention actions for the areas covered by the Law on the duty of vigilance.

3.2.1 Breaches of human rights and fundamental freedoms



3.2.1.1 Violations of fundamental rights, and more specifically breaches of the freedom of expression

In the telecommunications sector, one of the main concerns regarding breaches of human rights and fundamental freedoms relates to infrequent government requests which impact a large number of customers at the same time.

Orange is strongly committed to promoting freedom of expression and respect for privacy in the ICT sector, in particular within the Global Network Initiative (GNI), a multi-stakeholder platform, including Internet operators, NGOs, universities and socially responsible investors. Orange and its peers meet regularly as part of this body to exchange best practices relating to government requests in the telecommunications sector. More specifically, they deal with potential conflicts between the commitment and duty of sovereign governments and the responsibility of telecommunications companies with respect to human rights (network interruptions, illegal Internet content, etc.). By pooling the resources of every operator, it makes it possible to perform a complete analysis of the legal and regulatory framework country by country and to establish a dialog with governments and international institutions (United Nations, European Commission, the Council of Europe). It is aimed at making recommendations on local policies or laws in the interest of respecting freedom of expression and respect for privacy throughout the world.

The GNI principles updated in 2017 provide a common framework at Group level for the preparation of policies and procedures relating to freedom of expression and respect of privacy in the ICT sector. This framework applies wherever Orange has operational control, and to the extent possible with its business partners, suppliers and distributors. In this respect, Orange ensures that:

- the members of the Ethics Committee and the personnel responsible for the major decisions affecting freedom of expression and privacy are fully aware of these Principles and the most efficient means to ensure their implementation;
- in circumstances where freedom of expression and privacy may be either compromised or promoted, decisions taken incorporate these Principles;
- the implementation of these Principles ensures the safety and freedom of the Company's employees.

Orange reports annually on how the Group applies these principles (see gallery.orange.com).

Any demands by governments that could violate freedom of expression or fundamental freedoms are treated locally by Orange, but under the authority of the Group's General Secretary and the Group Corporate Social Responsibility Department in order to ensure that every demand respects the required formal legal or regulatory requirements as analyzed by the GNI. Thus, Orange ensures that an official request in writing has been received by the manager of the relevant entities, and that it is reported internally to the Group. A synthesis of these elements as well as the guidelines set forth by the Group CSR Committee are presented to the Ethics Committee.

Like other GNI member companies, Orange is independently assessed on its progress in implementing the GNI Principles. The purpose of the assessment is to enable the GNI Board of Directors to determine whether each member company is making good faith efforts to implement its principles in a continuous improvement process. The independent assessment, which includes both a review of the company's processes (systems, policies and procedures) and a review of specific case studies, concluded in 2019 that the implementation of the GNI Principles is indeed a priority for the Group, that the principles are integrated into Orange's policies, and that Orange is making good faith efforts to implement the GNI Principles in a process of continuous improvement. The next assessment will take place in 2022.

Furthermore, since 2012, as part of its annual human rights impact assessment (HRIA) measuring the gap between commitments made by governments (human rights in principle) and the possibility of those rights being enjoyed in practice in the relevant country (human rights in practice), Orange has asked Verisk Maplecroft, a specialist external firm using a methodology based on United Nations and OECD standards, to conduct a customized assessment of the risks incurred in terms of respect for human rights in each countries where Orange is an operator. This multi-criteria analysis notably includes corruption risks, breaches of democracy and freedom of expression, the degree of digital inclusion, human security and discrimination. New criteria in respect of government stability and civil security during elections were added in 2020, in response to the increase in violations of freedom of expression and even human security in recent years.

This analysis, which forms the basis for assessing risk by geography and for targeting the actions to be taken by the Group, is shared with the entities as part of the Vigilance Plan, and gives rise to discussions with the managers of the regions covering the countries most at risk. It sets out the governance and processes implemented by the Group, as well as the GNI principles to which the Group adheres in conducting its business (see below). In particular, the Group has set up a specific business continuity plan for pre-election periods in high-risk countries, including personnel safety and security, critical infrastructure protection, and continuity of service to customers.

3.2.1.2 The preservation and protection of human rights and fundamental freedoms towards its employees or those of its supply chain, and more particularly, breaches of the freedom of expression

Social dialogue

The Orange Group promotes a substantial structured dialog involving its employees, labor unions and associations of employee representatives. With a focus on increased transparency and collaboration, Orange has set up employee representative institutions for all scopes. Each of these institutions has its own powers which improve the social dialogue.

Orange recognizes the right for its employees to have freedom of association, representation and membership of a trade union in accordance with the principles set by the ILO convention no. 87 of 1948 on freedom of association and the right to organize. Employees are free to become members of their choice of trade union or not to do so.

Worldwide Works Council

The Worldwide Works Council is a forum for social dialogue created by an agreement signed in June 2010. It enables all Group employees worldwide to be represented, and to exchange information with employee representatives on transnational economic, financial and employee-related issues.

Its tasks are as follows:

- promote the communication of Group issues to employee representatives;
- improve the Group's social dialogue at the global level;
- be part of the Corporate Social Responsibility (CSR) development strategy.

The Council does not replace existing national representation bodies or the European Works Council. It complements the agreement signed in 2006 with the UNI global union on respect for fundamental rights. It meets at least once a year at the initiative of its Chair, who is the Group's Chairman and Chief Executive Officer or his representative, and whenever exceptional circumstances so require, with the agreement of management.

European Works Council

The European Works Council is a European-level forum for social dialogue on economic, financial and employee-related issues. It was created by an agreement signed on April 14, 2004.

Its tasks are as follows:

- develop social dialogue at the European level;
- create a forum for discussion and dialogue on broad economic, financial and employee-related issues at an overall European level that go beyond the borders of any single country (industrial and innovation strategy, major investment policies, employment, etc.);
- complement the national social dialogue bodies, without aiming to replace or supervise them.

The European Works Council meets at least three times a year, and whenever exceptional circumstances so require. Its members receive regular information on the life of the Group, and conference calls are organized whenever warranted by events.

Other national social dialogue bodies

The France Works Council is responsible for ensuring communication and dialogue with the employee representatives from the Group's various entities in France. It meets at least four times a year. It receives information on the activity, the financial position, and changes in the Group's employment and structure.

There are also different national social dialogue bodies that enable employee representatives to be heard. In regions where representative bodies are not legally required, the Group promotes the creation of employee forums in order to establish formalized dialogue.

3.2. 1.3. Promoting diversity and inclusion



Orange, through Sustainable Development Goal 10 “Reduced inequalities” chosen as a focus for its commitment, acts to promote diversity and inclusion. The aim is to make the Company an ever more inclusive place, giving everyone the opportunity to grow and contribute to creating value for the community.

The Group's Diversity & Inclusion policy was reviewed in February 2021.

Gender equality is the first pillar of the Group's Diversity & Inclusion policy. It is a commitment shared by all Orange entities worldwide. The second pillar is equal opportunity and the fight against discrimination. Within this framework, each country is responsible for choosing at least one other dimension of diversity, in addition to gender equality, corresponding to its economic, employee-related and social challenges, from among the following five dimensions: disability, origin, age, identity and opinions. Lastly, in view of its corporate purpose and its strategic plan, the Group adopted digital equality as the third pillar of its Diversity & Inclusion policy in 2020.

The policy is based in part on the global agreement on gender equality in the workplace, the fight against discrimination and violence, and work-life balance of July 2019, and on the French scope of the fifth agreement on gender equality in the workplace and work-life balance of January 2018.

Gender equality in the workplace

The Group has been a signatory of the United Nations' Women Empowerment Principles since March 2015.

Orange's gender equality policy is steered by the Professional Equality Strategy Committee, created in 2011 and composed of members of the Executive Committee, as well as representatives of Group entities. It is based on the global agreement on gender equality, the fight against discrimination and violence, and work-life balance, signed with UNI Global Union. This agreement, which can be applied and adapted in the countries where the Orange Group operates, is based on a participatory approach by all stakeholders and is built through structured social dialogue. It is implemented through local committees and a network of dedicated liaison officers in the main subsidiaries and entities. It is monitored jointly by the Group and UNI Global Union. The professional equality policy is based on five pillars:

- gender balance in all of the Group's occupations, particularly in the technical and digital professions;
- equal access by women to positions of responsibility: the Group has set a target of 35% women in management bodies by 2025, in line with the percentage of women in its workforce;
- equal pay for women and men, based on a methodology for analyzing pay gaps, common to all countries;
- work-life balance;
- the fight against violence.

Equal opportunity and combating discrimination

Equal opportunity and combating discrimination are included are the global agreement on gender equality signed with UNI Global Union in July 2019. In that agreement, Orange reaffirms the need for fair treatment of candidates during the hiring process, based on the skills and experience required for the position. Similarly, in this agreement Orange commits to ensuring that access to training, career development and work organization is subject to objective criteria.

For years, the equal opportunities policy has been a key factor in promoting diversity and inclusion in the Group. It focuses on five areas:

- disability: Orange has been a signatory of the International Labor Organization (ILO) “Enterprise and Disability” charter since 2015, and participates in global movements (The Valuable 500, ILO GBDN). The Group has adopted the GSMA principles to make digital technology a lever for the inclusion of people with disabilities. In France, in 2020 Orange continued to implement the commitments laid down in the sixth agreement for the employment and integration of people with disabilities, signed in June 2017. In 2020, Orange signed the seventh agreement for the employment and integration of people with disabilities and the fight against discrimination. It covers the period from 2021 to 2023;
- origins: Orange is a signatory of the Charter of Mobilization for the Defense of Equality against Racism, and is attentive to the risks of discrimination related to origins (ethnic, social, cultural, geographic, etc.). The Group is a partner of the McKinsey Barometer/Club 21e siècle, which aims to measure sociocultural diversity in management bodies, and has initiated a project to listen to stakeholders on this issue;
- age: Orange has signed an intergenerational agreement for the 2019-2021 period. It covers the Group's companies in France and takes three areas into account: the sustainable integration of young people into employment, the employment of seniors and the

transmission of knowledge and skills. The Group is also committed to the inclusion of young people from working class backgrounds, and supports associations working for equal opportunity, notably through the commitment of Orange employee volunteers;

- identity: Orange is a signatory to the LGBT Commitment Charter and the UN Standards of Conduct for Tackling Discrimination against LGBTI people;
- personal opinions: Orange has developed a Neutrality Charter.

Digital equality

Orange's commitment to digital equality is evidenced in the International Charter for Inclusive Artificial Intelligence.

In France, Orange has set itself the objective of recruiting at least 30% women among people attending digital training programs (cybersecurity, data, Cloud, customer service) at its new apprentice training center.

3.2.3 Health and safety preventive measures applicable to Orange and its subsidiaries

Group occupational health and safety policy

Orange's commitment to occupational health and safety is led by its Chairman and CEO, and is regularly reaffirmed, as it was in the third policy letter on health, safety and quality of life at work dated January 21, 2017. This policy is based on the global health and safety agreement, signed in November 2014, the Law on the duty of vigilance, and lastly, on the laws and regulations in force in each country.

The Orange Group's global health and safety agreement

Signed in November 2014, the global health and safety agreement lays down a common foundation for the Group in terms of health, safety and quality of life at work and health protection in general.

Based on a participatory approach involving all stakeholders, including social dialogue in the field of occupational health and safety, it also requires particular vigilance with regard to the occupational health and safety policy specific to Orange's partners and subcontractors, which preceded the Law on the duty of vigilance and ISO 45001 by several years.

It requires the introduction of an occupational health and safety management system (OHSMS) complying with an international standard within each Group entity. The choice of standard on which the OHSMS is based is left to each entity: it may be the Group OHSMS standard, itself based on the OHSAS 18001 standard or the new international standard ISO 45001.

The Group Occupational Quality of Life Department supports its rollout through pairs of occupational health and safety officers and operational managers. Their role is to diagnose any shortfall between what the Group expects and what is actually achieved, and to implement corrective action plans. Since 2015, the Group Occupational Quality of Life Department and, in France, the Shared Occupational Safety Area, have been organizing audits every two years, or every three years for ISO 45001-certifying audits.

The agreement promotes any initiatives to participate in health protection programs adapted to the local context and practices. In particular, it ensures non-discrimination in terms of health for employees, with a particular focus on population groups that are vulnerable due to their state of health.

It has led to the adoption of coverage of health costs as a standard measure within the Company's entities in Africa. The financing of the construction and maintenance of Orange Villages by the Orange Foundation (active since 2005), with schools, water sources and mother and child health and protection centers, is also part of the health promotion initiatives called for by the global health and safety agreement.

The application of this agreement is based on the monitoring of quantitative and qualitative criteria; it is carried out on an ongoing basis by the network of health and safety officers and managers, and gives rise to Group reporting organized annually by the Group Occupational Quality of Life Department and quarterly by the Shared Occupational Safety Area in France. Compliance with its application is subject to internal and external audits.

The analysis of these indicators and the development of action plans are supported, monitored and promoted by the Group Occupational Quality of Life Department, and are presented annually to the Worldwide Works Council and the UNI global union, among other bodies. Among other aspects, these indicators cover accidents (workplace and commuting accidents), sick leave, the existence of a health and safety policy letter specific to the entity, the establishment of an OHSMS (and related training initiatives together with audit dates) and public health campaigns aimed at the Orange population and/or the general population. It should be noted that accidentology is monitored not only within the Group, but also at its subcontractors.

Social dialogue on occupational health and safety

Social dialogue on occupational health and safety takes place within the legal or employee representative bodies and takes the form of agreements signed with social partners.

In France, a number of agreements promote the implementation of the Group's quality of life at work policy and the active prevention of risks to employee health and safety:

- the telework agreement, amended in 2017, makes telework part of an overall financial, employee-related and environmental approach, with expected benefits in terms of well-being at work and savings in travel time;

- the agreement on the assessment and adaptation of workloads (2016) sets out a methodological framework and common benchmarks providing a practical understanding of workload issues in relation to changes in the workforce and skills;
- the digital transformation support agreement (2016) notably enables the implementation of individual digital use reports;
- the agreement on the assessment and prevention of psychosocial risks (2010) notably endorsed the creation of a National Stress Prevention Committee;
- the agreement on workplace gender equality and work-life balance (2018) offers a framework to facilitate the best balance between professional and private life for each employee, whilst enabling them to overcome major life events.

Four new agreements were signed in 2020 and are included in the report on the implementation of the 2020 plan.

In France, the Social and Economic Committee (SEC) is responsible for health, safety and working conditions, and is supported by the Commission on Health, Safety and Working Conditions (CHSWC).

Internationally, each subsidiary now has a Health and Safety Committee (HSC), and receives ongoing support from the Group Occupational Quality of Life Department.

The Worldwide Works Council and the European Works Council are also forums for social dialogue on occupational health and safety within the Group.

Orange is also present through the Group Labor Relations Department and the Group Occupational Quality of Life Department in the Sectoral Social Dialogue Commission of the European Commission's telecommunication branch. Occupational health and safety are central to the work of that body.

People involved in prevention

In France, the network of more than 200 prevention officers provides methodological support to the teams and offers advice and local expertise on occupational risk prevention issues.

Internationally, health and safety managers play a similar role, and receive support from the Group Occupational Quality of Life Department through regular unilateral contacts or exchanges of best practices, including through the "Quality of Life at Work by Orange" meetings organized on occupational health and safety topics such as the duty of care, harassment and violence in the workplace, telework, health crisis management, and international business travel and assignments.

The organization of occupational health services depends on the legislation in each country. They are either inter-company or stand-alone units, as is the case in Côte d'Ivoire, Egypt, Senegal, Mali and Orange France.

Within the Group Safety Department, the Group also benefits from an occupational health and safety team comprising an international safety director and an international medical consultant, who work in cooperation with the Group's major divisions and provide them with support through shared constant health and safety monitoring on a specific site, expert field visits at the request of the entities, and assistance to entities and employees on international business trips or expatriates in the event of a health and/or safety crisis.

In addition, as part of its prevention policy, the Group organizes an annual employee survey known as the "Employee Barometer," enabling everyone to express their views on their experience of working at Orange and their understanding of the Group and its transformation. This system was designed to allow each Group entity to better understand the expectations.

Safety instructions for workers working on mobile antennas

Antenna exposure limits are subject to international recommendations and national regulations. All antennas provided by Orange to its subsidiaries meet European standards and the Company carries out controls during installation using simulation tools.

The Group regularly trains employees working near or at antennas on safety recommendations and how to use a dosimeter, in particular at the request of MEA countries. Security perimeters are assessed and defined around the antennas; their calculation is based on a tool made available to subsidiaries by the Group. In particular, Orange raises awareness of employees working near or on antennas about the safety instructions provided in European Directive no. 2013/35/EU of June 26, 2013 and in France its Decree no. 2016-1074 of August 3, 2016, even in countries not subject to the directive.

The Coronavirus pandemic (COVID-19)

The COVID-19 epidemic affects human health, and specifically that of Orange's employees, suppliers, subcontractors and customers, as well as the Group's activity and financial position.

As a supplier of key business services, Orange must ensure the service continuity of its electronic communications services, and particularly its critical services.

As of April 19, 2020: Orange put in place, notably in France, a business continuity plan that mainly covers the network and information systems supervision and operation teams, security teams, technical support, data center staff and response teams.

Orange is closely following developments in the epidemic, and is prioritizing the health and safety of its employees. The Group has appointed a global Coordinator who reports directly to the Chairman and Chief Executive Officer, as well as contacts for the Group's various geographical areas. Orange has adjusted its business practices to comply with the health guidelines issued by each national authority, whilst also ensuring business continuity.

The long-term effects of public authority lockdown measures, which the Group has also applied, are now starting to be measured, and in particular, the potential psychological effects of isolation on employees. Details of the actions implemented to mitigate these risks are included in the report on the implementation of the 2020 Vigilance Plan.

3.2.4 Given the ongoing strong growth in digital usage, Orange is also implementing additional environmental protection measures



Orange confirmed its commitment to the climate at the United Nations Climate Action Summit in New York in September 2019, by signing alongside other major corporations the UN Global Compact commitment for an average global warming trajectory of 1.5 °C by 2100 compared with pre-industrial levels.

As part of its Engage 2025 strategic plan announced in December 2019, Orange had undertaken to be Net Zero Carbon by 2040, 10 years ahead of the GSMA target and the IPCC recommendations for a 1.5 °C trajectory⁽²⁾ (aimed at limiting the average warming of the planet to 1.5 °C by 2100 compared with pre-industrial levels).

Being Net Zero Carbon in 2040 means:

- as a priority, to have reduced its greenhouse gas emissions (Scopes 1, 2 and 3) as much as possible by 2040, both for its operations and those of its stakeholders (suppliers, employees, customers);
- to contribute to carbon sequestration in an amount equivalent in carbon to the residual emissions in 2040 (Scopes 1 and 2, and Scope 3 partially, i.e. those on which the Company has a direct effect). This can be done through capital investments (e.g. forest planting) or financing of negative emissions (certified or verified) from projects that sequester carbon naturally (e.g. in forests, mangroves or agroforestry) or technologically;
- in addition, to contribute to emissions avoided outside its scope, for example by marketing products and services with a better carbon score than existing products or services – or by financing certified or verified emissions avoidance.

NB: The target of Net Zero Carbon by 2040 is taken in the context of the special report by the IPCC⁽³⁾ published in October 2018, which encourages decision-makers to do their best to limit average global warming to 1.5°C compared with pre-industrial levels by 2100. The aim is to avoid the risk of serious climate disruptions. Meeting the 1.5 °C target by 2100 means Net Zero Carbon worldwide no later than 2050.

The Net Zero Initiative⁽⁴⁾, in which the Orange Group is taking part, formalized a standard for Net Zero Carbon for businesses in February 2019.

To become a Net Zero Carbon company, in 2019 Orange developed an action plan based on a number of simultaneous approaches: pursuing energy efficiency actions in IT and the networks, developing new capacities for renewable electricity, with the use of PPAs (Power Purchase Agreements), the creation of new solar farms and expanding ESCO programs as well as a specific policy for its buildings and vehicle fleets. As a priority, Orange is attempting a real reduction in its scope 1 and 2 emissions on which the Group has a direct influence. Orange is acting on the other part of scope 3 with its main suppliers through the International Telecommunications Union, the GSMA and the JAC (Joint Audit Cooperation).

This commitment breaks down into the targets for 2025 listed below:

- 100% of the range of Orange-brand equipment (boxes, decoders, etc.) committed to an eco-design approach that reduces the carbon footprint during manufacture and distribution, as well as electricity consumption during use;
- more than 90% of fixed terminals (boxes, set-top boxes) distributed by Orange to be collected, plus 30% of the mobile devices by country in Europe and the equivalent in volume of WEEE of 20% of the mobile devices sold in the MEA zone;
- at least 10% of total sales volumes of mobile devices in Europe derived from refurbished devices;
- attractive repair service available for mobile devices sold by Orange in of its host countries in Europe; and

for its own needs, Orange intends to further purchase refurbished equipment, through its internal “marketplace” or by promoting equipment catalogs to its suppliers. Orange is also committed to taking into account criteria relating to the carbon footprint throughout the life cycle and the circular economy when selecting network and IS equipment.

² The IPCC P2 scenario in its Special Report 1.5 °C of October 2018, https://www.ipcc.ch/site/assets/uploads/sites/2/2019/09/IPCC-Special-Report-1.5-SPM_fr.pdf

³ https://www.ipcc.ch/site/assets/uploads/sites/2/2019/09/IPCC-Special-Report-1.5-SPM_fr.pdf

⁴ <http://www.netzero-initiative.com/fr/news/publication-net-zero-initiative>

3.3 Suppliers and subcontractors

Training for buyers

The Group Procurement Department has set up CSR clause training in 27 countries. The training is based on a largely practical format which provides procurement managers and buyers with the necessary skills to easily negotiate CSR clauses with co-contracting parties.

CSR-dedicated supplier forum

Orange's many awareness-raising and training actions include its annual CSR supplier forum, which brings together the main suppliers to discuss best CSR practices.

JAC forum

For a number of years, the JAC has held an **annual forum in China**, which is attended by industry stakeholders (suppliers and subcontractors), NGOs (IPE, ICO, Ellen MacArthur Foundation), academic and international institutions (ILO, Global Compact, CDP), representatives of government departments, audit firms and other telecoms operators.

JAC Academy

The **JAC Academy** was launched in 2018 as part of a drive towards continuous improvement and the applying equivalent CSR standards to supply chains.

The Academy enables the JAC's methodology to be cascaded down to suppliers. Its purpose is to raise suppliers' awareness and to train them on the JAC's audit methodology as described above. Once trained, suppliers must carry out their own production site audits and feed the results back to the JAC. Suppliers establish indicators to measure the CSR performance of their production sites.

The indicators and audit reports which the JAC receives are analyzed to identify the main issues which arose, and best practices are shared at the quarterly thematic JAC seminars. This process encourages suppliers to work together on the continuous improvement of CSR policies and approaches.

CSR & Procurement Steering Committee

The Committee meets twice a year in order to reconcile major CSR issues with the procurement strategy. It is co-chaired by the Group Procurement Director and the Group CSR Director. It also discusses the main CSR topics at Group level, for the Europe and MEA regions.

4. Whistleblowing and reporting system

In 2018, the Group CSR department joined the Group's Compliance Department working group, created under the French Sapin 2 anti-corruption Law, to extend the Group's whistleblowing system to infringements related to human rights and fundamental freedoms, personal health and safety and the environment.

The whistleblowing system set up is the same system which has already been in place for a number of years. It is now open both for internal reports and reports from outside the Orange Group, via the e-mail address deontologie.alerte@orange.com.

This whistleblowing system aims to encourage everyone, including employees, to report any personal knowledge of conduct or circumstances which contravene Orange's anti-corruption policy, its policies and procedures on accounting, internal control or auditing, or which constitute a serious breach of human rights and fundamental freedoms, personal health and safety or the environment.

It is intended to be enhanced by the introduction of new services, and in particular, from 2021, a secure web platform for collecting and processing whistleblowing alerts. This new web platform should provide an international, centralized service, open seven days a week, 24 hours a day, easily identifiable and accessible, both internally and externally from the Internet, and which complies with legal and regulatory requirements. This service should also make it possible to manage, in a customized way, the Group whistleblowing systems, and those of the affiliates having joined them, using the same process for the collection and processing of reports.

This new service ensures as a priority the confidentiality of information, the protection of whistleblowers and the security of those in charge of processing the data. It should facilitate convergence within the Group, optimize processing, and contribute to the digitization and transformation of the Group.

To improve this plan and its whistleblowing procedure, Orange will put in place a communication plan that will raise awareness of this new platform known when it becomes available.

5. Monitoring mechanism and assessment of measures taken

A number of indicators were specified in the 2019 Vigilance Plan and were reviewed in 2020. Given the inclusion of new risks in two of the four clusters (Human Health, Safety and Security cluster and Environment cluster) mentioned in point 1 of the Vigilance Plan, new indicators have been added to measure these risks. The table below lists the indicators that the Orange Group has set out to meet its obligation to implement a monitoring mechanism and assessment of measures taken.

RISKS	GOVERNANCE	INDICATOR	CONTROL (STANDARDS AND AUDITS)
Lack of or faulty vigilance plan			
1. Lack of risk identification in its operations and in those of its suppliers (risk mapping)	GCSERC Ethics Committee Cross-functional steering group CSR & Procurement Steering Committee	Implementation of Group mapping in the entity	Internal audit CSR Department JAC audits
2. Failure in the design of preventive measures	GCSERC Ethics Committee Cross-functional steering group	Approval of the Plan in the entity's governance bodies (monitoring on the European scope)	Internal audit CSR Department
3. Failures in the implementation of preventive measures: execution of operations and processes (control systems)	GCSERC Ethics Committee BoD or Management Committee of Entities Cross-functional steering group	Approval of the Plan in the entity's governance bodies (monitoring on the European scope)	Internal audit CSR Department
4. Failure to provide evidence to authorities on time	Ethics Committee BoD or Management Committee of Entities Cross-functional steering group	Appointment or designation of the person responsible for the Vigilance Plan in the entity (broadened SOX scope)	Internal audit CSR Department
Human health, safety and security			
1. Physical or mental disability (death, occupational accident, occupational illness, disability, etc.) - 2. Non-compliance with safety instructions for employees and subcontractors working on the network in high-risk areas (construction sites at height, working on antennas, etc.)	GCSERC ExecComm RPOQLD WWC SEC GCSERC ExecComm RPOQLD WWC SEC	Frequency rate of occupational accidents (number of occupational accidents with lost time per million theoretical working hours) % of Orange employees trained in radio wave risks and safety instructions	DEKRA audits JAC audit Audit of local suppliers OHSAS 18001

3. Deterioration of working conditions jeopardizing human health, safety and security	GCSERC ExecComm DPQVT CGM SEC (6)	Employee Barometer: % > "satisfactory" for "Orange provides a working environment guaranteeing health and safety"	DEKRA audits JAC audit Audit of local suppliers OHSAS 18001
Abuses of Human rights and fundamental freedom			
1. Modern slavery or human trafficking within the framework of a known established contractual relationship	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Audit Cooperation	JAC audit Audit and assessment of local suppliers
2. Non-decent working conditions at suppliers' and subcontractors': remuneration that does not allow an adequate standard of living, right to rest, etc.	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Audit Cooperation	JAC audit Audit and assessment of local suppliers
3. Infringement of the child's right to harmonious education and development: prohibition of child labor, protection against content unsuitable for a young audience	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Audit Cooperation	JAC audit Audit and assessment of local suppliers
4. Infringement of the freedom of association and right to collective bargaining on working conditions	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Audit Cooperation	JAC audit Audit and assessment of local suppliers
5. Any act of discrimination: recruitment, work, salary, diversity, unfair procedures	GCSERC Ethics Committee CSR & Procurement Steering Committee	Number of action plans in the areas handled by the Joint Audit Cooperation	JAC audit Audit and assessment of local suppliers
6. Breach of the freedom of expression (in civil society)	GCSERC Ethics Committee CSR Department	Number of disconnection requests received from authorities	Commitment to GNI Principles JAC audit Audit and assessment of local suppliers
7. Violation of privacy	GCSERC Ethics Committee CSR Department	Number of customer data interception requests received from authorities	Commitment to GNI Principles JAC audit Audit and assessment of local suppliers
Environment			

1. Non-compliant processing of toxic and hazardous waste (poles in France and Poland, batteries, WEEE, etc.)	GCSECR Ethics Committee Circular Economy Committee	% of hazardous waste recovery	ISO 14001 certification JAC audits Group audits
2. Failure to fulfill the commitments made by Orange in terms of the environment and use of the circular economy,	GCSECR ExecComm Ethics Committee Circular Economy Committee	% progress on the roadmap of the Strategic Circular Economy Committee CO ₂ emitted in metric tons	Certification ISO 20400 JAC audits Group audits
3. Risk of infrastructure deterioration due to climate change	GCSECR ExecComm Ethics Committee	% of renewable electricity used	Certification ISO 20400 JAC audits Group audits

GCSECR: Governance and Corporate Social and Environmental Responsibility Committee.

ExecComm: Group Executive Committee.

DPOVT: Risk Prevention and Occupational Quality of Life Department

WWC: Worldwide Works Council.

OHSWCC: Occupational Health & Safety and Working Conditions Committee, which from January 1 is replaced by the SEC

SEC: Social and Economic Committee



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